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11 Special Counsel to Richard A. Marshack, Chapter 11 Trustee

12

13 **UNITED STATES BANKRUPTCY COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

15

16 In re:
17 THE LITIGATION PRACTICE GROUP P.C.,
18 Debtor.

Case No.: 8:23-bk-10571-SC

Chapter 11

19 **OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY UNDER
11 U.S.C. § 362 FILED BY MERCHANTS
CREDIT CORPORATION**

21

22 Date: January 17, 2024
Time: 1:30 p.m.
Judge: Hon. Scott C. Clarkson
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, CA 92701

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1 Richard A. Marshack (the “Trustee”) of the bankruptcy estate (the “Estate”) of The Litigation
2 Practice Group P.C. (“LPG” or the “Debtor”) in the above-captioned bankruptcy case (the “Case”),
3 through undersigned counsel, hereby files this Opposition to the Motion for Relief from the
4 Automatic Stay under 11 U.S.C. § 362 filed by Merchants Credit Corporation (the “Motion”) [Bankr.
5 Doc. No. 767] and respectfully states as follows:

6 **I. INTRODUCTION**

7 1. On or about March 20, 2023, the Debtor filed a voluntary petition for relief under
8 Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court of the Central District of
9 California. On May 4, 2021, the Court entered the *Order Directing United States Trustee to Appoint*
10 *Chapter 11 Trustee* [Bankr. Docket No. 58]. Pursuant to his May 8, 2023, *Acceptance of Appointment*
11 *as Chapter 11 Trustee* [Bankr. Docket No. 63], the Trustee accepted his appointment as the Chapter
12 11 Trustee in the Case, and he continues to serve in this capacity at this time.

13 2. The Motion seeks relief from the automatic stay to permit the Washington State Court
14 of Appeals to rule on a dispute between the Debtor and Movant, Merchants Credit Corporation
15 (“MCC”). As the Motion outlines, MCC paid approximately \$26,000 into escrow (the “Judgment
16 Funds”) pending the appeal. The Judgment Funds represents the attorneys’ fees and costs that the
17 Superior Court of the State of Washington in and for the County of King awarded to the Debtor after
18 finding MCC’s claims against LPG to be “frivolous” that “had no merit (none) and were filed in bad
19 faith.” A true and accurate copy of the underlying Third Party Complaint filed by MCC and the trial
20 court’s May 18, 2022, Judgment Summary and Order on Motion for Prevailing Party Costs and Fees
21 Pursuant to RCW 4.84.185 (collectively, the “Judgment”) are attached hereto as **Exhibit 1 and 2**
22 **respectively**. MCC appealed the Judgment to the Washington Court of Appeals before the petition
23 date.

24 **II. ARGUMENT**

25 3. The Trustee is mindful of the need to conserve Estate resources. An unnecessary
26 modification of the stay is not only a burden on the Estate, but would permit the Washington Court
27 of Appeals to usurp this Court’s jurisdiction and the rights of the Trustee or other parties in interest
28 in this Case.

1 4. 11 U.S.C. § 362(d)(1) permits the modification of the automatic stay for “cause”;
2 however, bankruptcy courts must determine “cause” on a case by case basis and have discretion in
3 granting or denying relief from the automatic stay. *In re Am. Spectrum Realty, Inc.*, 540 B.R. 730,
4 737 (Bankr. C.D. Cal. 2015) (*citing Kronemyer v. Am. Contractors Indem. Co. (In re Kronemyer)*,
5 405 B.R. 915, 919, 921 (9th Cir. BAP 2009); *In re Plumberex Specialty Products, Inc.*, 311 B.R. 551,
6 556–57 (Bankr. C.D. Cal. 2004)). As set forth below, the Trustee submits that cause does not exist
7 to support the requested stay relief.

8 5. In response to Paragraph 4 in the standard form Motion, Movant asserts it is entitled
9 to relief from stay for the following reasons:

10 • 4(c) – Mandatory abstention applies under 28 U.S.C. § 1334(c)(2);
11 • 4(d) –The Movant’s claims are nondischargeable in nature and can be most expeditiously
12 resolved in the nonbankruptcy forum; and
13 • 4(e) – The Movant’s claims arise under nonbankruptcy law and can be most expeditiously
14 resolved in the nonbankruptcy forum.

15 6. The Trustee disagrees that mandatory abstention applies under 28 U.S.C. § 1334(c)(2).
16 MCC’s Third Party Complaint asserted claims under both the Credit Repair Organizations Act, which
17 is a federal statute, and Washington’s consumer protection act. Thus, the cause of action on appeal
18 in Washington is not based solely on a “State law claim or State law cause of action” and the federal
19 district courts would have jurisdiction over those claims. The Trustee also questions whether MCC’s
20 Third Party Complaint could be “timely adjudicated” in the unlikely event it is remanded to the trial
21 court given that MCC’s own briefing notes that only limited discovery was completed.

22 7. The Trustee assumes 4(d) was checked in error. There is no assertion that the
23 Judgment Funds in escrow or the potential claims of MCC against LPG are non-dischargeable.
24 Furthermore, the discharge of a debt in a liquidating chapter 11 case is not relevant.

25 8. With respect to the assertion in 4(e), while the issues raised in the appeal arise under
26 federal and Washington state law, the Trustee disagrees that the non-bankruptcy forum is the “most
27 expeditious” way to resolve these issues. There is no guarantee that an appellate ruling would fully
28 resolve the outstanding claims between the parties whereas this Court could provide such finality.

1 9. Many courts, including those in the Central District of California, have used the so-
2 called “*Curtis* factors” to determine whether the stay should be modified to permit litigation to
3 proceed in another form. The *Curtis* factors are taken from *In re Curtis*, 40 B.R. 795 (Bankr. D.
4 Utah 1984). While not all factors will be applicable to every situation, the factors to consider are

- 5 1. Whether the relief will result in a partial or complete resolution of the issues;
- 6 2. The lack of any connection with or interference with the bankruptcy case;
- 7 3. Whether the foreign proceeding involves the debtor as a fiduciary;
- 8 4. Whether a specialized tribunal has been established to hear the particular cause of
action and whether that tribunal has the expertise to hear such cases;
- 9 5. Whether the debtor's insurance carrier has assumed full financial responsibility for
defending the litigation;
- 10 6. Whether the action essentially involves third parties, and the debtor functions only
as a bailee or conduit for the goods or proceeds in question;
- 11 7. Whether the litigation in another forum would prejudice the interests of other
creditors, the creditors' committee and other interested parties;
- 12 8. Whether the judgment claim arising from the foreign action is subject to equitable
subordination under Section 510(c);
- 13 9. Whether movant's success in the foreign proceeding would result in a judicial lien
avoidable by the debtor under Section 522(f);
- 14 10. The interests of judicial economy and the expeditious and economical
determination of litigation for the parties;
- 15 11. Whether the foreign proceedings have progressed to the point where the parties
are prepared for trial; and
- 16 12. The impact of the stay on the parties and the "balance of hurt."

17 *In re Am. Spectrum Realty, Inc.*, 540 B.R. 730, 737 (Bankr. C.D. Cal. 2015) quoting
18 *In re Plumberex Specialty Products, Inc.*, 311 B.R. 551, 559 (Bankr. C.D. Cal. 2004
citing *In re Curtis*, 40 B.R. 795 (Bankr. D. Utah 1984).

19 10. While many of these factors are not applicable to the present dispute, those that do
20 apply weigh in favor of denying the Motion.¹ The first *Curtis* factor cannot be met because the
21 Court of Appeals would have to evaluate, in some form, the validity of MCC's claims against LPG
22 but such evaluation will not resolve or finalize those claims. Regardless of the Court of Appeal's
23 conclusions, its decision could be appealed or the case remanded back to trial court, and either
24 outcome would prolong the matter and create an unnecessary administrative burden on the Estate.

25 11. The Judgment Funds currently held in escrow subject to the outcome of the appeal
26 are property of LPG's Estate, and their disposition is directly tied to this Chapter 11 case. Because

27 28 ¹ While counsel for the Trustee has only reviewed limited documents from the state court record, it
does not appear that the third, fourth, fifth, sixth, eighth, or ninth *Curtis* factors are implicated in this
dispute.

1 a claim to recover funds of the Estate is best resolved by the Bankruptcy Court, the second *Curtis*
2 factor, “lack of connection with or interference with the bankruptcy case” also fails.

3 12. The potential of the appeal to usurp this Court’s jurisdiction over the core
4 proceedings of “allowance or disallowance of claims against the estate” and “other proceedings
5 affecting the liquidation of the assets of the estate” run counter to the auspices of bankruptcy court
6 jurisdiction. 28 U.S.C. § 157(2)(B) and (O). The Trustee has taken great pains to establish an
7 orderly claims administration process to treat the many creditors in this Case equitably. Allowance
8 of stay relief for a party seeking to recover Estate assets in another forum runs counter to the
9 seventh *Curtis* factor, that the litigation would not “prejudice the interests of other creditors” whose
10 claims are pending before this Court. Furthermore, denying the stay relief requested and
11 administering the claims in this Court is not only fair to the other parties in interest in the Case,
12 but also evens the “balance of hurt” between the parties as advised by the twelfth *Curtis* factor.

13 13. Finally, at first glance, the tenth (judicial economy) and eleventh (readiness for
14 trial) *Curtis* factors might seem to support granting the Motion, given that the appeal briefs are
15 completed. The Movant seeks to brush away the professional burden of the appeal process on the
16 Estate by suggesting that the Trustee simply waive oral argument, which the Trustee submits
17 would curtail his ability to protect the assets of the Estate. As explained above, any finding of the
18 Court of Appeals other than an affirmation of the trial court would still require litigation and
19 adjudication of another state court as well as this Court, which is the opposite of judicial economy.
20 When all relevant *Curtis* factors are applied to MCC’s appeal in the present context of this Case,
21 they weigh against granting stay relief to MCC.

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III. CONCLUSION

14. Based on the foregoing, the Trustee respectfully requests that this Court deny the Motion.

Dated: January 3, 2024

Respectfully submitted,

DINSMORE & SHOHL LLP

/s/ Christopher B. Ghio

Christopher B. Ghio
Christopher Celentino
Yosina M. Lissebeck
Tyler Powell (pro hac vice)

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

DINSMORE & SHOHL LLP
655 West Broadway, Suite 800
San Diego, California 92101

A true and correct copy of the foregoing document entitled (*specify*): **OPPOSITION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 FILED BY MERCHANTS CREDIT CORPORATION**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 3, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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Eric Bensamochan on behalf of Creditor Oxford Knox, LLC	eric@eblawfirm.us G63723@notify.cincompass.com

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on January 3, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY - VIA FEDEX

Honorable Scott C. Clarkson
United States Bankruptcy Court, Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 3, 2024
Date

Angelica Urena
Printed Name

/s/ Angelica Urena
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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